

CLARK COUNTY SCHOOL DISTRICT  
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**UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NEVADA**

A.M., a minor by and through her natural  
parent and guardian, ZARINAH  
MUHAMMAD; ZARINAH MUHAMMAD

Plaintiffs,

v.

CLARK COUNTY SCHOOL DISTRICT;  
JESUS JARA; A.J. ADAMS; FELICIA  
GONZALES; DIANE LEWIS;  
CHRISTOPHER SPARROW; JOHN DOE  
DEFENDANTS I THROUGH X; and, ROE  
ENTITIES I THROUGH X

Defendants.

Case No.: 2:19-cv-00687-RFB-VCF

**STIPULATION AND PROPOSED  
ORDER TO EXTEND DEADLINE  
UNDER ECF NO. 13**

**(SECOND REQUEST)**

Plaintiffs A.M., a minor by and through her natural parent and guardian, ZARINAH MUHAMMAD and ZARINAH MUHAMMAD ("Plaintiffs") and Defendants CLARK COUNTY SCHOOL DISTRICT; JESUS JARA; A.J. ADAMS; FELICIA GONZALES; DIANE LEWIS; and CHRISTOPHER SPARROW ("Defendants"), by and through their attorneys of record, hereby stipulate and agree pursuant to Local Rule 7-1 as follows:

1. Whereas, on March 9, 2020, the Court held a hearing on Defendants' Motion to Dismiss (ECF No. 4). The Court granted Plaintiffs leave to amend their complaint and ordered

1 Plaintiffs to file the amended complaint by March 30, 2020. ECF No. 13. The Court also ordered  
2 the parties to file a joint discovery plan/scheduling order by April 6, 2020, but did not prohibit the  
3 parties from renewing a request to stay of discovery. ECF No. 13.

4 2. Whereas, the parties were unable to meet the deadlines set by the Court on March  
5 9, 2020 (ECF No. 13) due to the unexpected pandemic and the effects of the same.

6 3. Whereas, the parties agreed and the Court approved a 30-day extension to the  
7 deadlines set by the Court on March 9, 2020. ECF Nos. 14 and 15. Plaintiffs' amended complaint  
8 would be due April 29, 2020, while the parties' joint discovery plan/scheduling order would be  
9 due May 6, 2020.

10 4. Plaintiffs filed an amended complaint on April 30, 2020. ECF No. 18. Defendants  
11 are still evaluating the allegations in the amended complaint, but anticipate filing a motion to  
12 dismiss. Accordingly, a request to stay discovery pending a decision on the motion may be  
13 renewed.

14 5. Whereas, the parties seek an additional two weeks to file a joint discovery  
15 plan/scheduling order or request to stay discovery in the case. The deadline would be May 20,  
16 2020.

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1           6.       Whereas, this is the second request for an extension regarding the filing of a  
2 stipulated discovery plan/scheduling order, which is made in good faith, not for the purposes of  
3 delay, and neither party is prejudiced by the extension.

4  
5 DATED: May 6, 2020

DATED: May 6, 2020

6 CLARK COUNTY SCHOOL DISTRICT  
7 OFFICE OF THE GENERAL COUNSEL

JUSTICE FORCE LAW GROUP LLC

8 By: /s/ Crystal J. Herrera  
9 Crystal J. Herrera (#12396)  
10 5100 West Sahara Avenue  
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12 Attorney for the *Defendants*

By: /s/ Zarinah J. Muhammad  
Zarinah J. Muhammad (#12830)  
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Las Vegas, NV, 89148  
Attorney for the *Plaintiffs*

13 **ORDER**

14 **IT IS SO ORDERED.**

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17 RICHARD F. BOULWARE, II  
18 UNITED STATES DISTRICT JUDGE

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20 DATED this 6th day of May, 2020.  
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